

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Emily M. Harlin,)	Civil Action No. 3:13-cv-02719-JFA
)	
Plaintiff,)	
)	
vs.)	<u>DEFENDANT'S RESPONSES TO</u>
)	<u>LOCAL RULE 26.01</u>
Wells Fargo Bank, N.A.,)	<u>INTERROGATORIES</u>
)	
Defendant.)	
)	

Defendant, Wells Fargo Bank, N.A., by and through its undersigned counsel, hereby answers the Local Rule 26.01 Interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None known.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff has requested a jury trial on her claims.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Wells Fargo Bank, N.A. is a subsidiary of Wells Fargo & Company, which is publicly held. Wells Fargo & Company is the only publicly held company that owns 10% or more of Wells Fargo Bank, N.A.'s stock. Wells Fargo Bank, N.A. does not own 10% or more of the stock in any publicly held company.

(D) State the basis for asserting your claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: This case is removed to this Court from the Richland County Court of Common Pleas.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: This case is unrelated to any other matter pending in this District.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Defendant is properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: None known at this time.

WOMBLE CARLYLE SANDRIDGE & RICE, LLP

By: /s/ M. Todd Carroll
Federal Bar No. 9742
Kevin A. Hall
Federal Bar No. 5375
1727 Hampton Street
Columbia, SC 29201
(803) 454-6504

Attorneys for Defendant Wells Fargo Bank, N.A.

Columbia, South Carolina
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